

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	PS Docket No. 17-344
Hurricane Response)	

**REPLY COMMENTS OF
WORLDNET TELECOMMUNICATIONS, INC.**

WorldNet Telecommunications, Inc. (“WorldNet”), by its attorneys, submits these reply comments in response to the Public Safety & Homeland Security Bureau of the Federal Communications Commission’s (“FCC” or “Commission”) public notice (“Public Notice”) seeking comment on the resiliency of the communications infrastructure, the effectiveness of emergency communications, and government and industry responses to the 2017 hurricane season.

I. Background

During September 2017, two hurricanes affected Puerto Rico: Irma and Maria. Although telecommunications companies typically have contingency plans, the magnitude of Hurricane Maria was enormous, and the resulting damage to infrastructure went beyond what even far-reaching contingency plans could have anticipated.

Hurricane Maria affected WorldNet’s business in different ways. Economically, WorldNet’s business suffered direct property damages, as well as, loss of income and extra expenses. WorldNet’s main central office was flooded, and WorldNet’s external plant was also damaged severely. The process to repair was hindered substantially due to lack of resources, permits, the weather, lack of materials, impassable roads, and other issues, including, unaffiliated

third-party repair crews that cut fibers that had already been repaired by telecommunication teams causing additional delays and expenses to repair.

Beyond the damage to WorldNet's facilities, electric power infrastructure was also seriously affected. After the hurricane, WorldNet did not have electricity for weeks. Because of this, WorldNet incurred significant expenses for generators, diesel fuel, and maintenance to maintain the continuous operation of its network, as well as to simply keep its administrative offices open. Due to high demand for generator fuel across the island, prices for the fuel and fuel delivery schedules fluctuated greatly, creating additional uncertainty. Moreover, because WorldNet's was operating on generator-power for weeks, the equipment required more maintenance and as more time passed, the generators were subject to failure, requiring additional generators as backup.

Customers at all levels were affected by these problems. Companies like WorldNet, which (in addition to its own facilities-based network) resells services and leases network facilities of other companies, were at the mercy of major carriers and wireless providers to process repairs. This affected WorldNet's revenues, even where our network was in service, but leased lines from other carriers were not in service. A number of customers requested service cancelations because, through no fault of our own, services were not available (either because of lack of power at customer locations or because third-party providers have seemingly prioritized the repair of their network facilities to restore their own customers first).

II. Comments

The initial round of comments submitted by parties in this proceeding have documented well the mix of circumstances and issues that resulted in the hurricane response that prompted this proceeding. The issues are numerous, complex, and sizable. WorldNet does not wish to

take all of that on in these comments. Rather, WorldNet would like to focus its comments on the need for increased federal funding that properly reflects the unique circumstances presented by Puerto Rico.

To be clear, WorldNet was and is not sitting back waiting for government help. Its engineering team provided 24/7 yeoman work to restore services and get its customers back online as soon as possible. For example, with water literally pouring in a damaged central office roof, WorldNet's team was able, within 48 hours, to remove, dry out, and reassemble its softswitch, piece by painstaking piece. This is just an example of what has been basically, since the hurricanes hit, a non-stop effort to use self-help to support our company and our customers. And we will not stop working. But, this is not enough. The damage from both a technological, operational, and financial impact is significant.

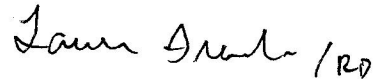
Various commenters have urged the Commission for increased federal funding through the Connect America Fund mechanism or via a new, dedicated emergency preparedness fund, with special emphasis paid to funding for the rural areas of Puerto Rico.¹ WorldNet joins these parties in urging the Commission for this increased funding. WorldNet would add, however, that the Commission should not just focus the Connect American fund nor just on rural areas.

Island-wide, Puerto Rico is unlike any other jurisdiction that the Commission is statutorily required to oversee and aid. As highlighted in comments already received, from its unique topography, the frequency with which it is subjected to widespread natural disasters, its well-documented economic woes, and the age, disrepair, and vulnerability of its basic service

¹ See, e.g., In the Matter of Connect America Fund, Petition of Puerto Rico Telephone Company, Inc. for the Creation of an Emergency Universal Service Fund, WC Docket No. 10-90 (filed January 19, 2018) (asking for the Commission to create a \$200 million emergency Universal Service Fund designated to facilitate restoration of service in insular areas by ETCs in Puerto Rico, citing Commission authority under the Commission's adjudicative authority and/or the Commission's authority under the Administrative Procedures Act.).

infrastructure, all of Puerto Rico is uniquely in need of federal assistance in a measure that is not proportionately reflected in current assistance funding mechanisms. The various procedural mechanisms suggested to among other things coordinate and improve response are a good thing. But, to be direct, what telecommunications providers in Puerto Rico (or at least WorldNet) most need is financial support to get back on their feet and provide a level of service, island wide, which this Commission would expect and demand in any of the other 50 states. Accordingly, WorldNet urges the Commission to re-think these funding mechanisms for Puerto Rico, providing for increased federal funding assistance commensurate with the unique and pervasive issues that Puerto Rico faces.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Lawrence Freedman / RD".

Lawrence Freedman
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WorldNet Telecommunications, Inc.

Filed: February 21, 2018